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*Attorney for Creditor Arca Industrial (NJ), Inc.*

**Hearing Date and Time:**  
October 3, 2019 at 10:00 a.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

SEARS HOLDING CORPORATION, *et al.*, Case No. 18-23538 (RDD)

Debtors. (Jointly Administered)

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**JOINDER BY ARCA INDUSTRIAL (NJ), INC. TO MIEN CO. LTD. ET AL.'S  
SUPPLEMENTAL OBJECTION TO CONFIRMATION OF THE MODIFIED  
SECOND AMENDED JOINT CHAPTER 11 PLAN OF SEARS HOLDINGS  
CORPORATION AND ITS AFFILIATED DEBTORS AND TO  
TERMINATE EXCLUSIVITY [DOC NO. 5266]**

**TO: THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:**

Arca Industrial (NJ), Inc. ("Arca Industrial"), by and through its attorney, Deborah J. Michelson, submits this joinder to Mien Co. Ltd. *et al.*'s Supplemental Objection to Confirmation of the Modified Second Amended Joint Chapter 11 Plan (the "Plan") of Sears Holdings Corporation and its affiliated debtors and to terminate exclusivity (the "Supplemental Objection to Confirmation") [Doc No. 5266], and represents and says as follows:

1. Arca Industrial is an administrative vendor creditor of this bankruptcy estate and timely filed proof of claim numbers 2957 and 5167.
2. Arca Industrial joins in and supports the Supplemental Objection to Confirmation.
3. There is a fundamental unfairness when professionals for the estate are paid hundreds of millions of dollars, and the vendor creditors on whose backs this has been carried out are asked to wait and see whether there might be any money recovered in the future for them.
4. Without limiting the Supplemental Objection to Confirmation, which arguments and authorities are incorporated herein by this reference, the Plan as proposed is just a further effort by the professionals to take every last penny for themselves, and leave the vendor creditors with nothing.
5. The Court should not confirm the Plan including for the reasons above and as set forth in the Supplemental Objection to Confirmation.

Dated: Cleveland, Ohio.  
October 1, 2019

MILLER GOLER FAEGES LAPINE LLP

By: /s/ Deborah J. Michelson  
Deborah J. Michelson, Esq.  
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Michelson@MGFL-law.com  
*Attorney for Creditor Arca Industrial (NJ), Inc.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

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SEARS HOLDING CORPORATION, *et al.*,

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(Jointly Administered)

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I, Deborah J. Michelson, an attorney admitted to practice in the State of New York, hereby certify that, on October 1, 2019, I caused true and complete copies of the Joinder by Arca Industrial (NJ), Inc. to Mien Co. Ltd. et al.'s Supplemental Objection to Confirmation of the Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and its Affiliated Debtors and to Terminate Exclusivity [Doc 5266] to be served upon each of the parties listed below via pre-paid properly addressed U.S. mail:

The Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court, S.D.N.Y.  
300 Quarropas Street, Room 248  
White Plains, NY 10601

Sears Holdings Corporation  
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Hoffman Estates, IL 60179  
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New York, NY 10036  
Attn: Ira S. Dizengoff

Dated: Cleveland, Ohio.  
October 1, 2019

MILLER GOLER FAEGES LAPINE LLP

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